

PR 20,30,31,32,33,35,50,61,62,72,110,150,170 and 171
(71FR42952)

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Comment No. 11

From: "Moroney, Roger (MED US)" <william.moroney@siemens.com>
To: <secy@nrc.gov>
Date: Sun, Sep 10, 2006 6:10 PM
Subject: Comments on proposed rule for Expanded Definition of By-product Materials

Hello,

Please accept these comments on the proposed rulemaking for the Expanded Definition of By-product Materials. In general, we are pleased with the approach taken and the use of comments received so far. The NRC has taken into account the requirements of the medical use community, and in particular those unique concerns of PET radiopharmaceuticals, in drafting of the proposed rules. Comments will follow the numbering in Section II(G) of the proposed rule (page 42970) for clarity. Those requests for comments on the discrete source issue will be skipped.

G(3) Decommissioning Information: While we have a very good understanding of the radionuclides present in cyclotrons manufactured by Siemens for PET radionuclide production, quantifying them has been difficult. There are a few good papers that have been published on this topic. Most recently in "Health Physics 90(6):588-596, June 2006". Additional information is available on larger cyclotrons and an EU paper EUR 19151-March 1999.

G(4) We concur with CORAR's recommendations regarding the ALIs and DACs for O-15 and N-13.

G(7) N/A

G(9) No comments

G(10) We agree with the implementation plan as outlined in the proposed rule.

General Comments:

We are concerned that the "grandfathering" of current RSOs, ANPs and AUs at PET radiopharmacies is not strong enough and we would like to see more definite language in the final rule.

In summary, we appreciate the opportunities that have been made available to comment on these proposed rules. Thank you,

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